

LUCAS VALLEY LAW  
MARK K. de LANGIS (SBN 190083)  
2110 Elderberry Lane  
San Rafael, California 94903  
Telephone: (415) 472-3892  
Facsimile: (415) 472-3977  
mdelangis@lucasvalleylaw.com

Attorney for Plaintiffs  
AMERICAN PRESIDENT LINES, LTD. and  
APL CO. Pte., LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

APL CO. Pte., LTD, a corporation, and  
AMERICAN PRESIDENT LINES, LTD., a  
corporation,

Plaintiffs,

v.

EXPORT INTERNATIONAL, INC., a  
corporation,

Defendant.

No. C 12-4459 EMC

**STIPULATED REQUEST FOR  
ORDER GRANTING RELIEF FROM  
CASE MANAGEMENT SCHEDULE**

Pursuant to Civil Local Rules 6-1(b), 6-2(a), 7-12, and 16-2(d) and (e), plaintiffs American President Lines, Ltd. and APL Co. Pte., Ltd. (collectively "APL") and defendant Export International, Inc. ("EI") request an order granting relief from the Case Management Schedule in the above-captioned matter.

No previous time modifications to the Case Management Schedule have been requested or granted. However, the parties have concurrently filed a Stipulated Request to Further Extend the Time to Respond to Complaint.

The requested enlargement of time/ relief from the Case Management Schedule is sought because APL and EI seek to explore all avenues of an early disposition of this dispute and are in

the process of exchanging documents and information to that end. EI's counsel has recently provided to APL's counsel a letter brief, including documents, supporting EI's position in this matter. APL and EI are actively engaged in settlement discussions. The parties believe it would be beneficial to allow them to seek a possible resolution of the matter, and thereby request relief from the Case Management Schedule. (*See* Declaration of Mark K. de Langis, filed in support of this Stipulated Request.)

IT IS HEREBY STIPULATED by and between plaintiff APL and defendant EI that the Case Management Schedule shall be vacated and amended to reflect the following dates:

Date	Event	Governing Rule
1/18/2013	Last day to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan	FRCP 26(f) ADR L.R. 3-5
1/18/2013	Last day to file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference	Civil L.R. 16-8 & ADR. L.R. 3-5(b)
1/18/2013	File either Stipulation to ADR Process or Notice of Need for ADR Phone conference	Civil L.R. 16-8© & ADR L.R. 3-5(b) & (c)
1/31/2013	Last day to complete initial disclosures or state objection in Rule 26(f) Report, file/serve Case Management Statement, and file/serve Rule 26(f) Report	FRCP 26(a)(1) Civil L.R. 16-9
2/7/2013	Case Management Conference in Courtroom 5, 17 <sup>th</sup> Floor, SF at 9:00 a.m.	Civil L.R. 16-10

DATED: December 14, 2012

LUCAS VALLEY LAW

By: /s/ Mark K. de Langis

Mark K. de Langis  
Attorneys for Plaintiffs  
AMERICAN PRESIDENT LINES, LTD.  
APL Co. Pte., Ltd.

1 DATED: December 14, 2012

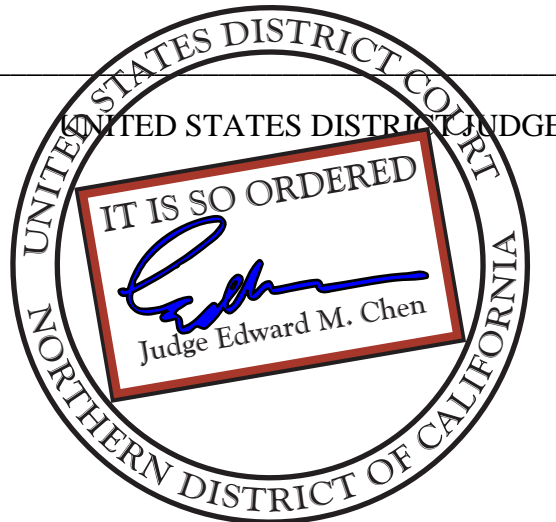
HELTZEL, WILLIAMS, YANDELL, ROTH,  
SMITH, PETERSEN & LUSH, P.C.

2  
3  
4 By: /s/ Michael C. Petersen

5 Michael C. Petersen  
6 Attorneys for Defendant  
7 EXPORT INTERNATIONAL, INC.

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

9  
10 Dated: 12/18/12



**ATTESTATION PURSUANT TO CIVIL L.R. 5.1**

I, Mark K. de Langis, attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document

/s/ Mark K. de Langis

Mark K. de Langis